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OFFICE OF THE SECRETARY

November 8, 2000

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Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Re: El Dorado Cellular, A California Corporation
E-911 Phase 2 Implementation Plan

Dear Ms. Salas:

On behalf of El Dorado Cellular, A California Corporation d/b/a Mountain Cellular, ("El Dorado") and pursuant to Section 20.18(i) of the Commission's Rules, enclosed is a narrative statement regarding El Dorado's E-911 Phase 2 implementation plans.

If you have any questions regarding this filing, please contact the undersigned.

Very truly yours,

B. Lynn F. Ratnavale

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c: International Transcription Service (w/ enc. on diskette)
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**El Dorado Cellular, a California Corporation d/b/a Mountain Cellular
Report on Implementation of Wireless E911 Phase II
Automatic Location Identification, CC Docket No. 94-102**

El Dorado Cellular, a California Corporation d/b/a Mountain Cellular pursuant to requirements set forth in CC Docket 94-102, hereby files this report on implementation of wireless E911 Phase II Automatic Location Identification.

I. Background/Contact Information

Carrier Identifying Information:

Carrier's Name:	El Dorado Cellular, a California Corporation d/b/a Mountain Cellular
Carrier's TRS Number:	803482

Contact Information:

Scott Hamilton
Vice President of Operations/General Manager
5174 Hillsdale Circle
El Dorado Hills, CA 95762
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II. E911 Phase II Location Technology Information

Type of Technology:

El Dorado Cellular, a California Corporation's ("El Dorado") network continues to utilize a significant number of rural, omni-directional cell sites. Moreover, many of these sites are designed to provide service along major traffic arteries and, therefore, provide coverage to significant areas where a sufficient number of other cells are not available. Under current technology proposals, this could impact the ability of El Dorado to allow for proper operation of the currently-proposed network-based solutions. Accordingly, at this time El Dorado's intention to deploy Phase II location handset-only technologies across its service territory. It is important to note, however, that only ALI-capable handsets can be located with Phase II accuracy, requiring deployment of ALI-capable handsets. Most products provide location of legacy handsets to varying levels of accuracy below the Phase II requirements. Because, handset-based E911 solutions require line of sight to GPS satellites, if testing indicates that handset solution alone will not meet the Phase II accuracy requirements, El Dorado may opt to utilize ground based

transmitters, such as in the network assisted system. Further, if it becomes apparent that the handset-only solution is not technically or financially feasible, or if handset availability is such that the Commission mandated percentage requirements cannot be met, El Dorado may be forced to implement either a network-based or other hybrid solution.

Testing and Verification: In all markets, El Dorado will use the empirical testing method per OET Bulletin No. 71.

Implementation Details and Schedule: It is El Dorado's intention to begin selling and activating location-capable handsets by October 1, 2001 in each of its markets subject only to the availability of location-capable handsets from the handset vendors; and it is El Dorado's intention to install all necessary network hardware and software upgrades to timely deploy a handset-based solution in response to a valid Phase II request subject only to the availability of the network hardware and software necessary to deploy such handset-based solution. El Dorado currently purchases its handsets from Qualcomm, Motorola, Nokia and other manufacturers, however, El Dorado is unable to confirm the general availability of the requisite hardware/software to implement handset-based E911. El Dorado has no control over the manufacturer's ability to actually meet this schedule and may be required to modify its E911 proposal or request a waiver or extension of its current deadlines if its manufacturer is unable to timely supply these key components.

PSAP Interface: El Dorado intends to work with each PSAP to mutually determine the best method of delivering Phase II information to that PSAP. It is El Dorado's intention to deploy the necessary hardware and software changes to timely deliver the Phase II information after receipt of a valid Phase II request. However, at this time the California Highway Patrol has indicated that they are not Phase II compliant, nor do they expect to be in the near future.

Existing Handsets: It is El Dorado's intention to track its penetration rates of location-capable handsets among its subscribers and take the steps necessary to ensure compliance with the FCC's penetration requirements.

Location of Non-Compatible Handsets: El Dorado is currently working with infrastructure vendors to optimize location identification of non-compatible handsets, such as roamers. El Dorado will continue to evaluate new technologies to improve the accuracy for non-compatible handsets and roamers. However, at present, El Dorado's decision to implement handset-based E911 will preclude its ability to provide E911 Phase II-compliant infrastructure to non-ALI handsets and will continue to offer Phase I-compliant service to these units.

Other Information: To date, El Dorado has not received a Phase II request.

III. Conclusion

This report does not constitute a final or irrevocable commitment to the ALI technology that El Dorado will employ. El Dorado may make good faith changes in its implementation plans after its initial report is filed, including changes in ALI technologies. Any changes will be filed within (30) days of adoption of any such change.